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15 Attorneys for Defendants
16 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,

Case No. 3:17-cv-00939-WHA

21 Plaintiff,

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR LETTER
BRIEF FOR TELEPHONIC HEARING**

22 v.

23 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendants.

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1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
 3 declaration based upon matters within my own personal knowledge and if called as a witness,
 4 I could and would competently testify to the matters set forth herein. I make this declaration in
 5 support of Defendants' Administrative Motion to File Under Seal Their Letter Brief for
 6 Telephonic Hearing ("Letter").

7 2. I have reviewed the following documents and confirmed that only the portions
 8 identified below merit sealing:

9 Document	10 Portions to Be Filed Under Seal	11 Designating Party
12 Letter Brief for Telephonic Hearing ("Letter")	13 Highlighted Portions	14 Defendants (Blue) Plaintiff (Green)
15 Exhibits 1 and 2	16 Entirety	17 Plaintiff

18 3. The blue-highlighted portions of the Letter discuss confidential information
 19 relating to certain confidential proceedings between Uber and certain former employees, which
 20 should be maintained as confidential subject to an agreement between parties to those
 21 proceedings.

22 4. The blue-highlighted portions of the Letter discuss confidential information
 23 relating to technology measures considered for application within Uber. This information is
 24 maintained as confidential. Disclosure of this sensitive information could reveal Uber's strategy
 25 and technology capabilities.

26 5. The green-highlighted portions of the Letter and Exhibits 1 and 2 contains
 27 information that has been designated "Highly Confidential – Attorneys' Eyes Only" or
 28 "Confidential" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective
 Order ("Protective Order"), which the parties have agreed governs this case (Transcript of
 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with
 Paragraph 14.4 of the Protective Order.

6. Defendants' request to seal is narrowly tailored to the portions of their Letter Brief that merits sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
12th day of December, 2017 at Washington, District of Columbia

/s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Michelle Yang has concurred in this filing.

Dated: December 12, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ